

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

GOLDMAN & BESLOW LLC

Attorneys at Law

7 Glenwood Avenue

Suite 311B

East Orange, New Jersey 07017

(973) 677-9000 (phone)

(973) 675-5886 (fax)

David G. Beslow, Esq. DGB-5300

Attorney for Debors, Brian and Linda Brophy

In Re:

BRIAN BROPHY,
LINDA BROPHY

Case No.: 16-34595

Judge: SLM

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by _____, creditor,

A hearing has been scheduled for _____, at _____.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☒ Certification of Default filed by Chapter 13 Trustee,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ **Other (explain your answer):**

This office represents the Debtors in the above referenced bankruptcy case. The Debtors could not appear prior to today's deadline to file opposition. We respectfully request that the Court schedule a hearing on this matter. The Debtors are in a trial loan modification and have made a payment each month since filing the bankruptcy petition. The Debtors have paid \$5000.00 into their plan.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 5/7/2019

Date: 5/7/19

/s/ David G. Beslow, Esq.
Debtor's Signature
[Signature]
Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.